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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

EUGENI TSVETNENKO,
a/k/a "Zhenya,"

Defendant.

CONSENT PRELIMINARY ORDER
OF FORFEITURE/
MONEY JUDGMENT

S6 15 Cr. 616 (AT)

----- X

WHEREAS, on or about February 18, 2022, EUGENI TSVETNENKO, a/k/a "Zhenya," (the "Defendant"), was charged, in an Superseding Information, S6 15 Cr. 616 (AT) (the "Information"), with conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 371 (Count One); and conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 371 (Count Two);

WHEREAS, the Information included a forfeiture allegation as to Count One of the Information, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, of all property, real and personal, which constitutes or is derived from proceeds traceable to the commission of the offense charged in Count One of the Information;

WHEREAS, the Information included a forfeiture allegation as to Count Two of the Information, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), of all property, real and personal, involved in the commission of the offense charged in Count Two of the Information or traceable to such property;

WHEREAS, on or about February 18, 2022, the Defendant pled guilty to Counts One and Two of the Information, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Counts One and Two of the

Information and agreed to forfeit, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and 982(a)(1) and Title 28, United States Code, Section 2461(c), a sum of money equal to \$15,422,513.90 in United States currency, representing proceeds traceable to the commission of the offense charged in Count One of the Information and property involved in the offense charged in Count Two of the Information;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$15,422,513.90 in United States currency representing the amount of proceeds traceable to the offense charged in Count One of the Information that the Defendant personally obtained and the property involved in the offense charged in Count Two of the Information;

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offenses charged in Count One of the Information that the Defendant personally obtained and the property involved in the offense charged in Count Two of the Information cannot be located upon the exercise of due diligence; and

WHEREAS, on or about January 27, 2022, the Defendant remitted a payment to the Government in the amount of \$15,422,913.90 to satisfy the Defendant's money judgment obligation (the "Payment");

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorneys, Olga I. Zverovich and Jilan Kamal of counsel, and the Defendant, and his counsel, Jonathan S. Kolodner, Esq., Eric D. Vandavelde, Esq., and Joshua Dratel, Esq. that:

1. As a result of the offenses charged in Counts One and Two of the Information, to which the Defendant pled guilty, a money judgment in the amount of \$15,422,513.90 in United States currency (the "Money Judgment"), representing the amount of

proceeds traceable to the offense charged in Count One of the Information that the Defendant personally obtained and the property involved in the offense charged in Count Two of the Information, shall be entered against the Defendant.

2. The United States Department of Treasury or its designee shall be authorized to deposit the Payment into the Treasury Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

3. The Government shall apply the Payment in full satisfaction of the Money Judgment.

4. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

[REMAINDER OF PAGE LEFT INTENTIONALLY BLANK]

5. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: 

6/22/22

Olga I. Zverovich / Jilan Kamal
Assistant United States Attorneys
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2514 / 2192

DATE

EUGENI TSVETNENKO

By: 

Eugeni Tsvetnenko

6/27/22

DATE


By: 

Jonathan S. Kolodner, Esq.
Eric D. Vandavelde, Esq.
Joshua Dratel, Esq.

6/27/22

DATE

Dated: June 28, 2022
New York, New York



ANALISA TORRES
United States District Judge